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# ***OAR Box 1192***

*Prepped by Candice Davis*

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**A-90-16**

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**United States Senate**  
WASHINGTON, DC 20510-4103

July 11, 1990

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William K. Reilly  
Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Mr. Reilly:

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This letter is in reference to the pending petition by the Ethyl Corporation to add MMT, a manganese-containing organic compound, to gasoline as an octane booster. I am extremely concerned about the potential for serious health impacts from the introduction of MMT into gasoline.

Manganese is listed as an air toxic in both the House and Senate-approved Clean Air Act amendments that are now pending in conference. As I am sure you are aware, manganese is capable of serious neurotoxic effects, including human brain damage. Several studies have demonstrated manganese's link to dementia and severe movement disorder (closely resembling Parkinson's disease), and manganese may induce premature aging of the brain. It is my understanding that scientists have not yet fully determined at what exposure levels the adverse neurological effects of manganese begin.

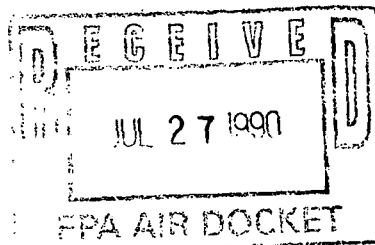
A major accomplishment of the original Clean Air Act was the phase-out of lead, another neurotoxic additive, from gasoline. Nonetheless, the legacy of lead in gasoline -- contamination of our cities and highways -- is widespread and intractable. This contamination is clearly linked to a continuing epidemic of childhood lead poisoning that tragically afflicted the neurological development of millions of American children. Like lead, manganese is not only neurotoxic; it is an element, and thus does not degrade or lose its potency with the passage of time. As a result, the manganese released into the environment through use of MMT in a given year accumulates over time with all the MMT released in the next year, and the next, and all subsequent years.

As a nation, we cannot afford to subject ourselves again to the tragic results of using a neurotoxic heavy metal in gasoline. Moreover, the commercialization of such a dangerous compound is unnecessary, given the wide availability of octane enhancers that are derivative from farm products, such as ETBE and ethanol, and are not hazardous air pollutants.

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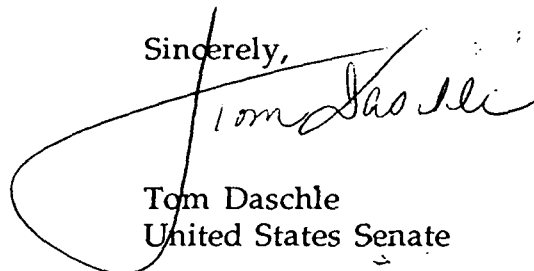


Finally, a decision to allow the use of MMT without a clear demonstration of the health impacts of its long term use would be in conflict with both the existing Clean Air Act, and with legislation now before the Clean Air Act conference committee. It is the intent of Congress to achieve greater control of fuels and vehicles to reduce motor vehicle air toxics. New neurotoxic gasoline additives should not be approved.

Please explain in detail the Agency's position on this issue. I would appreciate it if you would include in your response a full evaluation of the health and environmental effects of adding manganese to fuels.

Thank you for your attention to this important matter.

Sincerely,



Tom Daschle  
United States Senate

TAD/pwf